

AUG 29 2005

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

5 Attorney for Century Insurance Company Ltd. and
Hongkong Entertainment (Overseas) Investment Ltd.

6
7 **IN THE DISTRICT COURT**8 **FOR THE**9 **NORTHERN MARIANA ISLANDS**

10 **ELENITA S. SANTOS and**
11 **ANGEL SANTOS**

) **Civil Action No. 04-0030**

)
12 **Plaintiffs,**

)
13 **NOTICE OF MOTION AND**
14 **MOTION FOR PROTECTIVE**
15 **ORDER**

)
vs.
)

)
13 **HONGKONG ENTERTAINMENT**
14 **(OVERSEAS) INVESTMENT LTD .dba,**
15 **TINIAN DYNASTY HOTEL & CASINO and**
16 **CENTURY INSURANCE CO., LTD.**

)
Date : September 1, 2005
Time : 9:00
Judge : Hon. Alex R. Munson

)
16 **Defendants.**

17

18 **NOTICE**

19 **PLEASE TAKE NOTICE** that, on Sept 1, 2005, at 9:00 a.m. ~~p.m.~~, or as soon
20 thereafter as it may be heard, Defendant, Century Insurance Co. Ltd. and Hongkong Entertainment
21 Investment, Ltd., through Counsel, shall move this Court for a Protective Order.

MOTION

Defendants, Hongkong Entertainment Investment Ltd. and Century Insurance Co. Ltd. move this Court for a protective order preventing the depositions of Hongkong Entertainment Investment Ltd. and Century Insurance Co., Ltd. pursuant to Federal Rules of Civil Procedure Rule 26. The basis for this motion is provided in the memoranda of points and authorities filed herewith, the declaration of counsel and all proceedings of record in this case.

WHEREFORE, Defendants respectfully move this Court for a Protective order prohibiting the Noticed deposition of Hongkong Entertainment Investment Ltd. and Century Insurance Co., Ltd.

Dated this 21st day of August, 2005.

~~COLIN M. THOMPSON, ESQ.~~

Attorney for Century Insurance Company, Ltd. and
Hongkong Entertainment (Overseas) Investment, Ltd.